

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,
Plaintiff-Intervenor,
v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, et al.,

Defendants.

Civil No. 3:23-cv-00376

Judge Richardson

Judge Newbern

REPLY DECLARATION OF SUSAN N. LACY, MD, FACOG

I, Susan N. Lacy, MD, FACOG, pursuant to 28 U.S.C §1746, declare as follows:

1. I make this declaration of my own personal knowledge, and, if called as a witness,

I could and would testify competently to the matters stated herein.

2. One aspect of my practice is treating transgender patients ages 16 and up with

hormone therapy for gender dysphoria.

3. I currently have 14 adolescent patients whose treatment will be subjected to the Health Care Ban's prohibition on treating gender dysphoria with hormone therapy beginning on March 31, 2024.

4. Given that it is dangerous to abruptly terminate hormone therapy, should the Ban not be enjoined by July 1, 2023, I will have to disrupt those patients' ongoing and needed medication and begin to titrate their hormone dosages down prior to March 31, 2024.

5. Additionally, I have a few patients who are relatively new to hormone therapy and have appointments scheduled every three months so that I can monitor their hormone levels and adjust their care as indicated by their lab work. Should the Health Care Ban take effect, I am concerned that it will prevent me from providing quality care to my patients based on their individual circumstances given the prohibition on modifying current treatment.

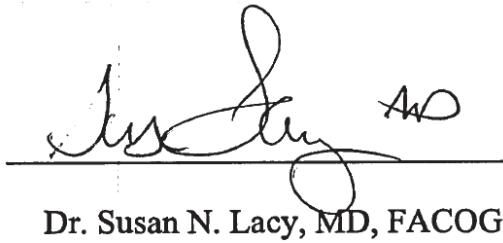
6. I am concerned for the health and well-being of my transgender patients should they not be able to access this life-saving care, and I do not want to withhold or modify care in a way that would both jeopardize the well-being of my patients and go against my best practice as a physician.

7. Should the Court grant a preliminary injunction prohibiting enforcement of the Ban, I would continue provide care for my existing patients, and any new patients, as I currently do—in accordance with the standards of care that guide my ordinary practice, and without having to titrate my adolescent patients down from therapeutic doses of their hormone therapy.

* * *

I declare under penalty of perjury the foregoing is true and correct.

Executed this 31st day of May 2023 in Memphis, Tennessee.



The image shows a handwritten signature in black ink. The signature reads "Susan N. Lacy, MD, FACOG". A small "AD" is written near the end of the signature. Below the signature is a solid horizontal line.

Dr. Susan N. Lacy, MD, FACOG

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2023, the undersigned filed the foregoing document via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

Steven J. Griffin Clark L. Hildabrand Trenton Meriwether Ryan N. Henry Brooke A. Huppenthal Office of the Tennessee Attorney General P.O. Box 20207 Nashville, Tennessee 3720 (615) 741-959 steven.griffin@ag.tn.gov clark.hildabrand@ag.tn.gov trenton.meriwether@ag.tn.gov ryan.henry@ag.tn.gov brooke.huppenthal@ag.tn.gov	Adam K. Mortara Lawfair LLC 40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com
	Cameron T. Norris (BPR# 33467) Consvoy McCarthy PLLC 1600 Wilson Blvd., Suite 700 Arlington, VA 22209 (703) 243-9423 cam@consvoymccarthy.com

s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637
ACLU Foundation of Tennessee
P.O. Box 120160
Nashville, TN 37212
Tel.: 615-320-7142
syarbrough@aclu-tn.org